IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Daniel E. Hall, Plaintiff,

v.

Twitter Inc., Defendant.

Case No. 1:20-cv-536-SE

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

Plaintiff, Daniel E. Hall ("Hall"), for the reasons stated within this motion, attached Memorandum of Law, and within Plaintiff's Motion to Default, and Motion to Strike, both filed on October 27, 2022, and incorporated here within, hereby requests the entry of default judgment upon Twitter for its participation in Judge Johnstone's self-promulgated unofficial pro hac vice policies, which intentionally circumvented the Courts prescribed LR governing practice and procedure which are governed by both statute and the Fed. R. Civ. P. to benefit Twitter. See 28 U.S.C. §§ 2071(a)-(b); Fed. R. Civ. P. 83.2.

Twitter, through its attorneys, intentionally misrepresented or omitted facts through written statements that were critical to the outcome of the case thus far, and this Court should take notice of the "deference to the deep-rooted policy in favor of the repose of judgments." *Hazel–Atlas,* at 244–45, 64 S.Ct. 997. *Estate of Stonehill, at 415, 452.* Twitter misconstrued or mischaracterized Rule 55(b) requirements and the holdings held in *Key Bank,* and knew or should have known that LR's 12 and Rule 4

come with a higher burden than Ru1e 55(b)(2) than just notice when submitting a response to a Summons.

Twitter also, through its attorneys, intentionally misrepresented the illegality of the Doc. 3 Motion and Doc. 3.1 MOL through their own statements, omitted crucial facts of the bias tribunal and Johnstone's illegal policies, held ex parte communications with the Appeals Court while jurisdiction lie with the Appeals Court, and now attempts to bring those same misrepresentations back from a non-prejudiced dismissal. Twitter lied to the court and Plaintiff intentionally, repeatedly, and about issues central to the truth-finding process, it can fairly be said that Twitter has forfeited its right to have Plaintiff's claims decided on the merits.

Wherefore, for the reasons stated within this motion, the attached Memorandum of Law, and within Plaintiff's Motion to Default, and Motion to Strike, both filed on October 27, 2022, and incorporated here within, Plaintiff hereby requests the entry of default judgment upon Twitter for its actions and participation.

Respectfully,

/s/ Daniel E. Hall
Aka, Sensa Verogna
SensaVerogna@gmail.com

"I declare, certify, verify and state declare pursuant to U.S. 28 U.S Code 1746 and under penalty of perjury that the foregoing is true and correct. "I declare, certify, verify and state declare pursuant to 50 U.S.C. app. § 521(4), that to the best of my knowledge, Twitter, Inc. is not a servicemember of any United States military forces. Signed this _27th_ day of October 2022 in the State of New Hampshire.

Daniel E. Hall

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of October 2022, the foregoing document was made upon the Defendant, through its attorneys of record to Jonathan M. Eck jeck@orr-reno.com and Julie E. Schwartz, Esq., JSchwartz@perkinscoie.com and Indraneel Sur, Lead Attorney. U.S. DOJ, indraneel.sur@usdoj.gov